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JUNIPER NETWORKS, INC.

Additional Attorneys Listed on Signature Page

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IMPLICIT NETWORKS, INC.,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

Case No. C 10-4234 SI

**STIPULATION REGARDING
DEADLINE TO REQUEST COSTS
AND/OR FEES AND
[PROPOSED] ORDER**

STIPULATION REGARDING DEADLINE TO
REQUEST COSTS AND/OR FEES AND
[PROPOSED] ORDER

Case No. C 10-4234 SI

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Implicit Networks, Inc. ("Implicit") and Defendant Juniper Networks, Inc. ("Juniper") hereby stipulate through their respective counsel of record as follows:

WHEREAS, on March 13, 2013, this Court granted Juniper's motions for summary judgment on invalidity and non-infringement (*see* Dkt. No. 205);

WHEREAS, on March 14, 2013, this Court entered Judgment in favor of Juniper (*see* Dkt. No. 206);

WHEREAS, Federal Rule of Civil Procedure 54(d)(2)(B) and Civil Local Rule 54-5(a) ordinarily would require Juniper to file for costs and fees no later than March 28, 2013 (14 days after the entry of judgment); and

WHEREAS, the parties believe that providing for a modest extension of this deadline would facilitate ongoing discussions between the parties and potentially conserve judicial resources;

NOW THEREFORE the parties through their undersigned counsel, hereby stipulate and request that the Court grant, pursuant to Local Rule 6-2, that Juniper will be deemed to have timely filed any request for costs and/or fees submitted on or before April 8, 2013.

IT IS SO STIPULATED.

March 22, 2012

Respectfully and jointly submitted,

/s/ David C. McPhie

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Attorneys for Plaintiff
IMPLICIT NETWORKS, INC.

1 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic
2 filing of this document has been obtained from the other signatories.

3
4 DATED: March 22, 2013

/s/ David C. McPhie

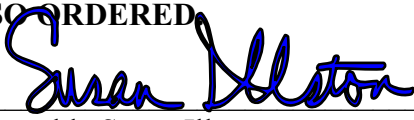
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ORDER

Pursuant to the stipulation of the parties, it is hereby ORDERED that that Juniper will be deemed to have timely filed any request for costs and/or fees in this action that is submitted on or before April 8, 2013.

PURSUANT TO STIPULATION IT IS SO ORDERED.

Dated: March 26, 2013



Honorable Susan Illston
United States District Judge

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IMPLICIT NETWORKS, INC.,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

Case No. C 10-4234 SI

**DECLARATION OF DAVID C. McPHIE IN SUPPORT OF
STIPULATION REGARDING DEADLINE TO REQUEST COSTS AND/OR FEES**

I, David C. McPhie, hereby declare as follows:

1. I am attorney with the law firm of Irell & Manella LLP, counsel for defendant Juniper Networks, Inc. ("Juniper") in this matter. I am a member in good standing of the State Bar of California and am admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to these facts under oath.

2. The parties are submitting a Stipulation Regarding Deadline to Request Costs and/or Fees in order to facilitate ongoing discussions between the parties and to potentially conserve judicial resources. The new deadline provided in that Stipulation is April 8, 2013.

3. This Court has not granted any previous extensions of time for Juniper to file any request for costs and/or fees.

4. The requested extension of time will have no effect on the schedule for this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of March, 2013, in Park City, Utah.

/s/ David C. McPhie

David C. McPhie